AMENDMENT TRANSMITTAL LETTER (Large Entity) Applicant(s): Richard D. Breault and Patrick L. Hagans					Docket No. C-3053	
Application No. 10/656,529	Filing Date 9/5/2003	Examiner Carol Chaney	Custome	er No.	Group Art Uni 1745	t Confirmation No.
MAR 2 5 2005						
COMMISSIONER FOR PATENTS: Transmitted herewith is an amendment in the above-identified application.						
The fee has been calculated and is transmitted as shown below.						
CLAIMS AS AMENDED						
	CLAIMS REMAINING AFTER AMENDMENT	HIGHEST # PREV. PAID FOR	NUMBER EXTRA	1	RATE	ADDITIONAL FEE
TOTAL CLAIMS	9 -	20 =	0	x	\$50.00	\$0.00
INDEP. CLAIMS	2 -	3 =	0	x	\$200.00	\$0.00
Multiple Dependent Claims (check if applicable)						\$0.00
TOTAL ADDITIONAL FEE FOR THIS AMENDMENT \$0.00						
No additional fee is required for amendment. Please charge Deposit Account No. in the amount of A check in the amount of to cover the filing fee is enclosed. The Director is hereby authorized to charge payment of the following fees associated with this communication or credit any overpayment to Deposit Account 50-1307 Any additional filing fees required under 37 C.F.R. 1.16. Any patent application processing fees under 37 CFR 1.17. Payment by credit card. Form PTO-2038. WARNING: Information on this form may become public. Credit card information should not be included on this form. Provide credit card information and authorization on PTO-2038. Dated: March 23, 2005 Stephen E. Revis						
Registration #26,609 I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on March 23, 2005 (Date) Signature of Person Mailling Correspondence Stephen E. Revis						

Typed or Printed Name of Person Mailing Correspondence



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of Richard D. Breault and

Patrick L. Hagans

Docket No.: C-3053

Examiner: Carol Chaney

Serial No.: 10/656,529

Group Art Unit: 1745

Filed: September 5, 2003

Title: Method of Operating a Fuel Cell System Under Freezing Conditions

2 Commissioner for Patents

P. O. Box 1450

Alexandria, VA 22313-1450

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6 **Sir**:

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AMENDMENT

In response to the Office Action dated January 7, 2005, please amend the above-identified application as follows:

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IN THE CLAIMS:

13 Cancel claims 1-21.

14 Add the following new claims:

22. A method for operating a fuel cell system, the system including a stack of PEM fuel cells including at least one cooler for carrying antifreeze through the stack to remove heat, the fuel cell system further including a water circulation system for accumulating water and circulating that water through water flow passages passing through each cell, wherein, at the time of start-up, the stack has frozen water therein and there is insufficient liquid water within the water circulation system to enable the circulation of water, the method for operating the fuel cell system including (a) starting up and operating the frozen stack by introducing non-humidified reactants into the cells and connecting a load across the stack to generate heat to increase the stack temperature to above 0°C and thereby melt frozen water within the stack, including accumulating liquid water during stack operation until there is sufficient liquid water to enable circulation of liquid water through the cell water flow passages, and thereafter